

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: CHARLENE R. HOUSE	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
CHARLENE R. HOUSE	:	
Respondent	:	CASE NO. 1-24-bk-00941

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 27th day of June 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. The Trustee avers that Debtor(s)' Plan is not feasible based upon the following:
 - a. The Plan is underfunded relative to claims to be paid – 100% Plan.
 - b. Secured claims not in Plan, specifically, Claim 2 of PHFA.
2. Trustee avers that Debtor(s)' Plan cannot be administered due to the lack of the following:
 - a. The Debtor has not provided to the Trustee copies of 2023 Federal Income Tax returns which are complete and legible as required by § 521(e)(2)(A).

WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 27th day of June 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

MICHAEL A CIBIK, ESQUIRE
CIBIK LAW, PC
1500 WALNUT ST, SUITE 900
PHILADELPHIA, PA 19102-

/s/Tammy Life

Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee